

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

APPLIED MATERIALS, INC.,

Plaintiff,

v.

TERRY BURKS,

Defendant.

Civil Action No.: 1:14-cv-01346 (GTS) (CFH)

**NON-PARTY WESTERWOOD GLOBAL USA, LLC'S  
NOTICE OF MOTION**

PLEASE TAKE NOTICE that on March 5, 2015 at 9:30 a.m., or as soon thereafter as counsel may be heard, one of the attorneys for non-party Westerwood Global USA, LLC ("WG USA"), shall appear before the Honorable Judge Hummel in the courtroom usually occupied by him in the James T. Foley U.S. Courthouse, 445 Broadway, Albany, NY 12207, and present: **NON-PARTY WESTERWOOD GLOBAL USA, LLC'S MOTION FOR PROTECTIVE ORDER AND RETURN OF LAPTOP**, wherein WG USA respectfully requests that the Court (1) enter a protective order preventing AMI and/or its agents from searching on the Lenovo (or any forensic image of the Lenovo) beyond searching for the specific metadata of the files identified in this suit as allegedly taken by Burks, and to prevent AMI from accessing any WG USA information; and (2) compel AMI to return the Lenovo to WG USA with all files intact but with the AMI files at issue removed. seeks

Dated: New York, New York  
February 2, 2015

Respectfully submitted,

ALSTON & BIRD, LLP

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*Attorneys for Non-Party Westerwood  
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